



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

August 27, 2021

Sylvia Vanderspek
Chief, Air Quality Planning Branch
Air Quality Planning and Science Division
California Air Resources Board
P.O. Box 2815
Sacramento, California 95812

Dear Chief Vanderspek:

This letter provides a response to the California Air Resource Board (CARB) exceptional event (EE) Initial Notification of Intent (INI) submittals, emailed March 15-16, 2021 regarding exclusion of ozone (O₃) data affected by EEs. These INIs were emailed by CARB in conjunction with Butte County Air Quality Management District (AQMD), Calaveras County Air Pollution Control District (APCD), San Luis Obispo County APCD, Feather River AQMD, Tehama County APCD, Tuolumne County APCD, Ventura County APCD, and Northern Sierra AQMD. The INI submittals stated that emissions from wildfires in 2018 and 2020 caused exceedances of the 2008 and 2015 O₃ National Ambient Air Quality Standards (NAAQS), spanning several dates in June, July, August, and September 2018 and August, September, October, and November 2020 at multiple monitoring sites within the following Nonattainment Areas (NAA):

2015 O₃ NAAQS

Site	AQS ID	CARB Monitoring District	NAA
Paradise-Airport Road	06-007-0007	Butte County AQMD	Chico (Butte County)
San Andreas-Gold Strike	06-009-0001	Calaveras County APCD	Calaveras County
Red Hills	06-079-8005	San Luis Obispo County APCD	Eastern San Luis Obispo County
Sutter Buttes	06-101-0004	Feather River AQMD	Sutter Buttes
Tuscan Buttes	06-103-0004	Tehama County APCD	Tuscan Buttes
Sonora-Barretta Street	06-109-0005	Tuolumne County APCD	Tuolumne County

2008 O₃ NAAQS

Site	AQS ID	CARB Monitoring District	NAA
Simi Valley – Cochran Street	06-111-2002	Ventura County APCD	Ventura County
Grass Valley	06-057-0005	Northern Sierra AQMD	Nevada County (Western Part)

Based on the information provided in the INI submittals, the EPA has determined that data from these events may affect attainment decisions for the 2008 NAAQS Serious areas and the 2015 NAAQS Marginal areas and the exceedances could be considered under the Exceptional Events Rule. The INIs indicated that preliminary 2020 design values for these monitors would change from violating to attaining based on exclusion of the EE-affected data. The EPA has been in communication with CARB regarding the specific events and demonstrations. We request formal submittal of the demonstration(s) for the events that occurred in 2018 no later than September 17, 2021. This deadline for the events that occurred in 2018 replaces the September 3, 2021 deadline stated in EPA's previous Initial Notification response, signed April 21, 2021. The deadline for demonstration(s) for the events that occurred in 2020 remains no later than November 19, 2021 so that the relevant actions can take these EEs into consideration. CARB may submit the demonstrations to the EPA concurrently with its initiation of the public comment period, provided CARB subsequently submits all public comments received and CARB's responses thereto.

The EPA is committed to providing timely guidance and input to CARB and the Districts should any questions arise as you work toward submitting the demonstrations by the above deadlines. We appreciate the coordination to date and look forward to continued communication throughout the development and submittal of these demonstrations. If you have any questions regarding this determination, please feel free to contact me at (415) 972-3183, Gwen Yoshimura at (415) 947-4134, or my staff lead, Dena Vallano, at (415) 972-3134. We appreciate your partnership in working through implementation of the Exceptional Events Rule.

Sincerely,



Elizabeth J. Adams
Director, Air and Radiation Division

cc (via email): Michael Benjamin, CARB
Jin Xu, CARB
Matthew Densberger, CARB
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Jason Mandly, Butte County AQMD
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